



Use of Genetically Modified Materials and Export Implications

To: Proprietors of Distilled Spirits Plants, Breweries, and Bonded Wine Premises, and Others Concerned

PURPOSE

This circular:

- Explains the possible implications on export trade of alcohol beverages produced using genetically modified (GM) materials (enhanced or bioengineered materials); and
- Informs our permittees of possible labeling requirements for exported products.

SUMMARY

The Alcohol and Tobacco Tax and Trade Bureau relies on the Food and Drug Administration (FDA) to evaluate the safety of food-contact materials, including those used in the beverage alcohol industries. FDA has evaluated data submitted for some GM materials, including yeast strains and enzymes. To the best of our knowledge, as a result of these evaluations, the FDA has granted some GM materials GRAS (Generally Recognized as Safe) status. However, the FDA does not require special labeling for foods produced using GM materials unless the product is nutrient enhanced or contains allergens or toxins. For FDA guidance on voluntary special labeling, see <http://www.cfsan.fda.gov/~dms/biolabgu.html>.

Many countries require the use of GM materials to be disclosed on a label. Some countries allow a product to consist of up to 0.9 percent (by weight) of GM materials without requiring their disclosure on a label. Other countries will not allow GM materials to enter their markets. Consequently, we strongly suggest that, for each country to which you plan to export alcohol beverages, you know that country's rules regarding the importation and labeling of alcohol beverages produced using GM materials. Currently, there is no standard labeling format in any country for products made using GM materials. That issue continues to be discussed at the Codex Alimentarius Committee on Food Labeling.

In the meantime, to check for any labeling requirements specific to the foreign country to which you are exporting, please visit our Web site at <http://www.ttb.gov/alcohol/info/interre1.htm>, or contact the International Trade Division at 415-625-5793 or 202-927-8110 or at itd@ttb.gov.

A handwritten signature in black ink, reading "John J. Manfreda". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

John J. Manfreda
Administrator
Alcohol and Tobacco Tax and Trade Bureau